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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12 Case No.: 2:25-MC-10

13 In the Matter of the Application of
14 Barkley & Associates Inc.

15 **DECLARATION OF S. RYAN**
16 **PATTERSON IN SUPPORT OF**
17 **DEFENDANT QUIZLET INC.’S**
18 **MOTION TO QUASH**
19 **PLAINTIFF’S DMCA § 512(h)**
20 **SUBPOENA**

21 *[Filed concurrently with Notice of*
22 *Motion, Motion, and [Proposed] Order]*

23 **I, Ryan Patterson, hereby declare as follows:**

24 1. I am a member of the law firm Wilson, Elser, Moskowitz, Edelman,
25 and Dicker LLP, attorneys for Defendant Quizlet, Inc. (“Quizlet”). I am familiar
26 with the facts of this matter from my review of the file maintained by my office and
27 my involvement with this action. I submit this declaration in support of Quizlet’s
28 Motion to Quash Plaintiff’s DMCA § 512(h) Subpoena. This is in addition to the
Memorandum of Points and Authorities in Support of Quizlet’s Motion to Quash

1 Plaintiff's DMCA § 512(h) Subpoena, which is supported by the accompanying
2 documents and are verified hereby.

3 2. I am a resident of Los Angeles County, in the state of California.

4 3. Attached as Exhibit 1 is a true and correct copy of a portion of the
5 hearing on Defendant's motion for summary judgment in this case that was held on
6 November 1, 2024.

7 4. Attached as Exhibit 2 is a true and correct copy of emails between
8 Plaintiff's counsel and Defendant's counsel dated November 13, 2024, exchanging
9 discovery requests.

10 5. Attached as Exhibit 3 is a true and correct copy of a portion of a
11 discovery hearing transcript in this case held on November 22, 2024.

12 6. Prior to filing Defendant's Motion to Quash Plaintiff's DMCA § 512(h)
13 Subpoena, I met and conferred with Plaintiff's counsel on March 18, 2025 regarding
14 the substance of the Motion. We were unable to come to an agreement regarding the
15 disposition of Plaintiff's DMCA § 512(h) subpoena.
16

17 I declare under the penalty of perjury that the foregoing is true and correct.
18 March 19, 2025

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP**

20 /S. Ryan Patterson/
21 S. Ryan Patterson
22 Attorneys for Defendant Quizlet, Inc.
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